

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI  
GREENVILLE DIVISION

LASHEA MOORE

PLAINTIFF

v.

Civil Action No. 4:19cv92-DMB-RP

THE MICHAELS ORGANIZATION, LLC  
and INTERSTATE REALTY  
MANAGEMENT COMPANY

DEFENDANTS

**COMPLAINT**  
**(Jury Trial Demanded)**

LaShea Moore files this complaint for damages and other relief against The Michaels Organization, LLC and Interstate Realty Management Company for violation of Title VII of the Civil Rights Act of 1964 as amended by the Pregnancy Discrimination Act of 1978. The plaintiff states the following in support of her claims.

**Parties**

1. The plaintiff LaShea Moore is an adult citizen of Mississippi who resides in Coahoma County at 212 Confederate Street, Clarksdale, Mississippi 38614.
2. The defendant The Michaels Organization, LLC is a New Jersey limited liability company with its principal place of business at 3 East Stow Road, Suite 100, Marlton, New Jersey 08053. This defendant is qualified to do business in Mississippi, and its registered agent for service of process in this state is National Registered Agents, Inc., 645 Lakeland East Drive, Suite 101, Flowood, MS 39232.
3. The defendant Interstate Realty Management Company is a New Jersey corporation with its principal place of business at 3 East Stow Road, Suite 100, Marlton, New Jersey 08053. This defendant is qualified to do business in Mississippi, and its registered agent

for service of process in this state is NRAI Agents, Inc., 645 Lakeland East Drive, Suite 101, Flowood, MS 39232.

### **Jurisdiction and Venue**

4. The Court has subject matter jurisdiction under 28 U.S.C. § 1331 and 42 U.S.C. 2000e-5(f)(3).
5. The Court has jurisdiction over the defendants, a limited liability company and a corporation qualified to do business and doing business in Mississippi.
6. 28 U.S.C. § 1391 and 42 U.S.C. 2000e-5(f)(3) as a substantial part of the acts and omissions giving rise to the plaintiff's claims and the unlawful employment practices complained of occurred in this judicial district.

### **Facts**

7. In 2018, the plaintiff was employed by the defendants as the property manager of the Driftwood Apartments in Drew, Mississippi.
8. The plaintiff performed her employment duties without complaint from her employer until one of her supervisors learned the plaintiff was pregnant.
9. The plaintiff's supervisor told the plaintiff that she should have waited until she had been in her position longer before getting pregnant.
10. After the learning of the plaintiff's pregnancy, the plaintiff's supervisors began making baseless complaints about her job performance and noting such baseless complaints in her employment.
11. Ultimately, the defendants terminated the plaintiff on the basis of the groundless complaints about her job performance.

12. The plaintiff filed a charge of discrimination with the U.S. Equal Employment Opportunity Commission. The EEOC issued a right to sue letter on or about March 18, 2019.

**Count One: Violation of Title VII and the Pregnancy Discrimination Act**

13. The defendants' actions described above constituted discrimination against the plaintiff on the basis of sex and specifically on the basis of pregnancy, childbirth, or related medical conditions.
14. The defendants' discriminatory conduct was in violation of Title VII of the Civil Rights Act of 1964 and the Pregnancy Discrimination Act of 1978, 42 U.S.C. 2000e *et seq.*
15. The defendants' discriminatory conduct toward the plaintiff was willful and intentional, thus warranting the imposition of punitive damages.

**Relief Demanded**

16. The plaintiff is entitled to the following relief:
- a. Back pay and benefits
  - b. Reinstatement or front pay
  - c. Compensatory damages for past and future pecuniary losses, emotional distress, inconvenience, and other non-pecuniary losses
  - d. Punitive damages
  - e. Attorney fees and expenses
  - f. Costs of this action
  - g. Any other relief to which she is entitled by law and established by the evidence.

Wherefore, LaShea Moore demands judgment against The Michaels Organization, LLC and Interstate Realty Management Company for the relief described above.

Dated: June 17, 2019.

Respectfully submitted,

/s/ James M. Priest, Jr. \_\_\_\_\_,  
Attorney for Plaintiff

Of counsel:

James M. Priest, Jr., MSB # 99352  
Gill, Ladner & Priest, PLLC  
344 Highway 51, Second Floor  
Ridgeland, MS 39157  
601-352-5700  
[jamie@glplawfirm.com](mailto:jamie@glplawfirm.com)